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September 8, 2022

Via ECF

Hon. Georgette Castner
United States District Judge
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

It is so ordered this 13th day
of September, 2022

Georgette Castner, U.S.D.J.

Re: **E/O Watters v. Andover Subacute & Rehabilitation**
Civil Action No.: 3:22-cv-04472
Motion Returnable: September 19, 2022

Dear Judge Castner:

This firm represents Defendants, Alliance HC II LLC d/b/a Woodland Behavioral and Nursing Center f/d/b/a Andover Subacute and Rehabilitation II (i/p/a separate entities, Andover Subacute and Rehabilitation II; Woodland Behavioral and Nursing Center); Chaim Scheinbaum; Louis Schwartz.

On or about July 28, 2022, Defendants filed a Motion to Dismiss which is presently returnable on September 19, 2022. A Motion for Remand was filed by Plaintiff on August 5, 2022 and is also returnable before Your Honor on September 19, 2022.

On September 1, 2022, Plaintiff filed a letter requesting that Defendants' Motion to Dismiss be stayed pending resolution of Plaintiff's Motion for Remand. By way of this letter, Defendants hereby join in Plaintiff's request to stay Defendant's Motion to Dismiss at this time.

We thank the Court for its time and attention to this matter. Should you have any questions or concerns, do not hesitate to contact my office.

Very truly yours,

/s/ S.Christopher Martino

S. Christopher Martino for
LEWIS BRISBOIS BISGAARD & SMITH LLP